Sacramento River Source Water Protection Program Comments on Secondary MCL Policy

Presentation Outline

- Thank you to Regional Board Staff and CV-Salts for their efforts in understanding our concerns and developing solutions to address them
- Importance of SMCLs to human health and welfare
- Value of protecting source water quality
- Technical comments and concerns
- Key requests for further consideration

 We request a guidance document to assist Regional Board staff to conduct implementation of site-specific factors in WDRs

Input from Division
 of Drinking Water
 (DDW) and
 Potentially Impacted
 Community Water
 Systems



- 4th Bullet Modify
 - "The net effect of discharges that affect improve receiving water quality"
- 5th Bullet Delete
 - "The presence or absence of other mineral (e.g., anion-cation balance) that may mitigate or aggravate aesthetic acceptability"
- 9th Bullet Clarify
 - "The practicality and feasibility of achieving compliance with the SMCLs at the point-of- discharge (including consideration of source control and pollution prevention programs, treatment alternatives, the cost for achieving compliance, the availability of alternative water supplies for drinking water, ability to pay, and other economic factors including the cost of non-compliance)"

- 12th Bullet Modify
 - "Potential for the permitted discharge to affect the concentration of constituents identified in Tables 64449-A and 64449-B at downstream and downgradient community water systems MUN designated water bodies to ensure a safe drinking water supply for users"
- 13th Bullet Expand
 - "Need for additional monitoring to track the net effect of permitted discharges at locations upgradient of downgradient well locations where groundwater is extracted for water supply and to determine the need for additional management requirements to protect the supply."
- 16th Bullet Modify
 - "Modeling and any changes reduction in contaminants due to fate and transport factors such as dilution and soil adsorption."

- Consider Consultation with DDW and Potentially Impacted Community Water Systems
 - 8th Bullet
 - "Evaluation of downstream or down-gradient community water system(s) to determine if a waiver under Title 22, section 64449.2 has been obtained or if the provisions of Title 22, section 64449.4 are being met."
 - 9th Bullet
 - Any evaluations determined to be related to drinking water systems
 - 10th Bullet
 - "The ability of drinking water treatment processes to remove contaminants and the potential effect on drinking water treatment costs for downstream and downgradient community water systems"
 - Additional Item
 - The potential for an SMCL to have existing, new or pending human health information or regulatory threshold.

- Compliance Item (a) Clarify
 - "Compliance with the chemical constituent water quality objective may be determined using tests other than for "total", such as methods using variations of filtered samples, where such methods have been analyzed for their appropriateness in representing the quality of treated drinking water..."

Summary of Key Requests

- Provide for guidance document to assist Regional Board staff with implementation
- Clarify, Modify, Expand, or Delete selected factors
- Consider consultation with DDW and potentially impacted community water systems
- Clarify language in compliance to provide intent for "appropriateness"

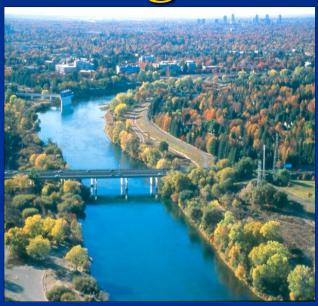
Contact Information for Sacramento River Source Water Protection Program

Thank you for the opportunity to provide stakeholder input.









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